# IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

DHI GROUP, INC. F/K/A DICE HOLDINGS, INC. AND RIGZONE.COM, INC.,

Plaintiffs,

v.

DAVID W. KENT, JR., SINGLE INTEGRATED OPERATIONS PORTAL, INC. D/B/A OILPRO AND OILPRO.COM, ET AL.,

Defendants.

C.A: NO.: 16-cv-01670

#### PLAINTIFFS' SECOND AMENDED TRIAL EXHIBIT LIST

Ps' Ex.	Admitted	Description	Bates No.	Ds' Objection(s) <sup>1</sup>
1		2014-08-15 David Kent to Bessemer	Bessemer 0000049	
2		2013_03_11 Bud Montang to David Kent	Bessemer 0000217	
3		WITHDRAWN		
4		WITHDRAWN		
5		2010-08-11 Stock Purchase Agreement (Dice Holdings, Inc. and Rigzone.com, Inc.)	DHI_0000713-917	R
6		2010-08-11 David Kent Employment Agreement	DHI_0000978-87	R
7		2015-10-28 David Kent email to Michael Durney RE: Profuse networks/Oilpro deck	DHI_0002483	
8		WITHDRAWN		

<sup>1</sup> A=Authenticity; H=Hearsay; NP=Not Produced; R=Relevance

Ps' Ex.	Admitted	Description	Bates No.	Ds' Objection(s) <sup>1</sup>
9		2015-10 Pro Networks Series A	DHI_0002508-26	
10		Due Diligence - Technology outline	DHI_0007990-95	Н
11		Rigzone Purchase Agreement	DHI_0008853-54	
12		DHI 2010 Staff Member Handbook	DHI_0017378-448	R
13		Rigzone Monthly Buisness Review September 2013	DHI_0060001-16	R
14		WITHDRAWN		
15		Presentation re. Oilcareers	DHI0007887	
16		WITHDRAWN		
17		2016-04-25 Jeremy Antonini email to Joseph Triepke, et al. RE: Revised Oilpro Team Update	Dufrin 125 HL	R

Ps' Ex.	Admitted	Description	Bates No.	Ds' Objection(s) <sup>1</sup>
18		2015-09-21 David Kent email to Jeremy Antonini RE: New Members and Soft Member Job Notifications	Dufrin 27	
19		WITHDRAWN		
20		2016-04-11 Estevan Dufrin email RE: Chat with Laura Bumby - 2014-12-19	Dufrin_000037	
21		2016-03-17 David Kent email to Estevan Dufrin RE: Rigzone Bill	Dufrin_000057	
22		2014-04-11 Estevan Dufrin email to David Kent RE: position filled	Dufrin_000076	R
23		Trello.com - Trojan Horse	Dufrin_000107	H; R
24		2016-01-28 Estevan Dufrin email to Brad Smith RE: Rusty account	Dufrin_000120	R
25		2015-10-27 David Kent text to Jeremy Antonini	Dufrin_000134	

Ps' Ex.	Admitted	Description	Bates No.	Ds' Objection(s) <sup>1</sup>
26		2014-06-23 David Kent email to Estevan Dufrin RE: Sends	Dufrin_000138	
27		2014-09-07 David Kent email to Estevan Dufrin RE: New list	Dufrin_000178	
28		Layering the Cake	Fairbanks 00875-903	Н
29		2014-01-23 Stephan Zappelin email to Jonathan Fairbanks RE: OilPro Model	Fairbanks000110	Н
30		EXCEL SIOPCO Financial Projections 2013-2019	Fairbanks000111	Н
31		2013-10-30 Stephan Zeppelin email to Jonathan Fairbanks RE: OilPro	Fairbanks000113	Н
32		Oct. 2013 GEC deck to OilPro	Fairbanks000114-122	Н
33		2016-09-06 Jonathan Fairbanks email to Michael Weekley RE: 2014 valuation analysis - brief history of JBF deal	Fairbanks000164	Н

Ps' Ex.	Admitted	Description	Bates No.	Ds' Objection(s) <sup>1</sup>
34		GEC presentation - GEC: A Trusted Partner for SIOPCO's Growth	Fairbanks000165-189	Н
35		2016-06-16 Email from Jonathan Fairbanks Re. SIOPCO 2016 P&L	Fairbanks000193	R
36		2014-12-19 Jonathan Fairbanks email to Marita Fairbanks RE: Fwd: STOPCO Admin - Dec. 2014	Fairbanks000294-98	Н
37		2014-10-08 Jonathan Fairbanks email to David Kent RE: Thanks	Fairbanks000371-72	
38		2014-10-08 Jonathan Fairbanks email to Steven Giacona RE: Thanks	Fairbanks000373-74	Н
39		2016-10-27 David Kent email to Jonathan Fairbanks RE: Removal of the Cancer	Fairbanks000787	R
40		2013-01-10 David Kent email to Jonathan Fairbanks RE: Financials, etc resumes and customers are paramount	Fairbanks001174	

Ps' Ex.	Admitted	Description	Bates No.	Ds' Objection(s) <sup>1</sup>
41		Dec. 2016 signed SPA selling JBF interests	Fairbanks001478-1497	R
42		WITHDRAWN		
43		WITHDRAWN		
44		https://www.forbes.com/sites/georgea nders/2013/11/07/a-twitter-user-is- worth-110-facebooks-98-linkedins- 93/#64192e132e8c	N/A	Н
45		2015_07_21 Oilpro	N/A	H; NP
46		2015_07_21 Oilpro II	N/A	H; NP
47		Emails between Bumby, Robins, and Kent	Oilpro 0000701	R
48		2013-10-20 Email b/t David Kent and Bud Montang	Oilpro 0000890	R
49		2015_08-27 Correspondence	Oilpro 0001023	R

Ps' Ex.	Admitted	Description	Bates No.	Ds' Objection(s) <sup>1</sup>
50		2016_03_04 from Matt Kent to Dufrin	Oilpro 0004221	H; R
51		2015_06_19 Gchat Conversation	Oilpro 0004706	R
52		2016_02_17 Gchat Conversation	Oilpro 0004717	
53		2015-01-18 Email from David Kent	OilPro 0004734	
54		2016_01_21 Conversation b/t Matt Kent, Brian Robins, and David Kent	Oilpro 0005017	R
55		2015_06_11 Email from Dufrin to D. Kent.	OilPro 0005255-7	R
56		Email Transmitting Dice Energy Presentation	Oilpro 0027438-66	R
57		2013-05-16 Email b/t David Kent and Bud Montang	Oilpro 0027633	R
58		2011-11-18 Email b/t David Kent and Bud Montang	Oilpro 0029282	H; R

Ps' Ex. No.	Admitted	Description	Bates No.	Ds' Objection(s) <sup>1</sup>
59		2013-10-01 Michael Durney email to David Kent RE: Congrats and Partnership - Oct. 2013 DK to Durney	Oilpro_0000001	
60		2013-08-20 Michael Durney email to David Kent RE: Update	Oilpro_0000013	
61		2015-10-28 Michael Durney email to David Kent RE: Oilpro Update	Oilpro_0000029-30	
62		2014-03-06 David Kent email to Laura Bumby RE: Rigzone	Oilpro_0000579	R
63		2015-03-27 Estevan Dufrin email to David Kent, et al. RE: Operation Resume Hoard Part 1	Oilpro_0000704-705	R
64		2014-09-18 Laura Bumby email to David Kent	Oilpro_0000948	R

Ps' Ex.	Admitted	Description	Bates No.	Ds' Objection(s) <sup>1</sup>
65		2013-10-30 Leland Richardson email to David Kent RE: Invitation to connect on Oilpro	Oilpro_0001125-26	R
66		HMA Feb. 2014	Oilpro_0001144-45	
67		2014-07-10 Estevan Dufrin email to David Kent RE: Follow up	Oilpro_0001213-14	R
68		2014-07-10 Estevan Dufrin email to David Kent RE: Operation brief	Oilpro_0001217	R
69		Operation Siege and Trojan Horse	Oilpro_0001218	R
70		HMA Aug. 2014	Oilpro_0001223-24	
71		2014-11-17 John Reese email to David Kent RE: Holly Henderson email	Oilpro_0001240-41	R
72		HMA Mar. 2015	Oilpro_0001296-97	

Ps' Ex.	Admitted	Description	Bates No.	Ds' Objection(s) <sup>1</sup>
73		HMA Nov. 2015	Oilpro_0001381-82	
74		2013-10-30 David Kent email to Oilpro Support RE: Invitation to connect on Oilpro	Oilpro_0002545-47	R
75		2014-03-19 David Kent email to Melvin Montang RE: DHI - good acquisition	Oilpro_0002568	R
76		2014-04-03 David Kent email to Phillip Crawford RE: Unhappy	Oilpro_0002577-79	R
77		2014-04-22 David Kent email to Laolu Okewole RE: Dear Oil Pros	Oilpro_0002584-85	R
78		2014-04-24 David Kent email to Carol Okojie RE: A request for information on Ms. Holly Henderson and a request for permission to login to the Oilpro website	Oilpro_0002586-88	R

Ps' Ex. No.	Admitted	Description	Bates No.	Ds' Objection(s) <sup>1</sup>
79		2014-12-22 David Kent email to Estevan Dufrin	Oilpro_0002646	
80		2015 SIOPCO Goals	Oilpro_0002647	
81		2013-06-11 Bud Montang to David Kent Re. Question	Oilpro_00026644-45	R
82		2015-03-10 David Kent email to Bud Montang RE: Announcement OilCareers and Rigzone are combining strengths, find out when!	Oilpro_0002672-73	R
83		2015-04-06 David Kent email to Jeremy Antonini RE: Operation Resume Hoard Part 1	Oilpro_0002684-89	R
84		2015-04-06 David Kent email to Leland Richardson RE: Operation Resume Hoard Part 1	Oilpro_0002690-95	R

Ps' Ex.	Admitted	Description	Bates No.	Ds' Objection(s) <sup>1</sup>
85		2015-07-19 David Kent email to Estevan Dufrin RE: UK	Oilpro_0002728-30	
86		2015-08-28 David Kent email to Michael Durney RE: Competition, etc.	Oilpro_0002735-37	
87		HMA Nov. 2013	Oilpro_0004070-71	
88		2015-07-17 David Kent email to Estevan Dufrin RE: 4th Party	Oilpro_0004179	R
89		2016-01-20 Brad (Virtual Bench) email to Estevan Dufrin RE: Welcome Back to Rigzone	Oilpro_0004213-14	R
90		2016-01-27 Holly (Virtual Bench) email to Estevan RE: Locked account	Oilpro_0004216-17	R
91		2016-01-29 Laura Bumby email to Estevan Dufrin RE: Holly log-ins	Oilpro_0004219	R

Ps' Ex. No.	Admitted	Description	Bates No.	Ds' Objection(s) <sup>1</sup>
92		Slip sheet - document provided in native format - rz cl 15.xlsx	Oilpro_0004222	H; R
93		Slip Sheet - document provided in native format - Sales Team Accounts V3-4-5-6 MR 7(1).xlsx	Oilpro_0004223	H; R
94		2016-01-20 Estevan Dufrin email to Brad Smith RE: Welcome back to Rigzone	Oilpro_0004287-88	R
95		2015-04-06 Laura Bumby email to Estevan Dufrin RE: Operation Resume Hoard Part 1	Oilpro_0004340-42	R
96		2015-11-25 Michael Durney email to David Kent RE: Profuse / Oilpro discussion	Oilpro_0004460-72	
97		2016-01-27 Michael Durney email to David Kent RE: Interaction stats	Oilpro_0004549-50	

Ps' Ex. No.	Admitted	Description	Bates No.	Ds' Objection(s) <sup>1</sup>
98		2015-03-16 David Kent email to Leland Richardson RE: DICE.com	Oilpro_0004762	
99		2015-05-26 Bryan Robins email to David Kent RE: Jesse Lisby and Laura Bumby RE: Jobs	Oilpro_0005071	R
100		2015-04-01 Estevan Dufrin email to Bryan Robins and David Kent RE: Post OC and Rusty Merge	Oilpro_0005117	R
101		Slip sheet - document provided in native format - CompAnalysisPostMerger.xlsx	Oilpro_0005118	R
102		2014-04-03 Password Request to David@tech.pro RE: HMA! Pro VPN - reset password request	Oilpro_0005167	
103		2014-08-26 Charles David email to David Kent RE: Please review this for consistency	Oilpro_0005190-91	R

Ps' Ex.	Admitted	Description	Bates No.	Ds' Objection(s) <sup>1</sup>
104		2015-06-10 Estevan Dufrin email to David Kent RE: Traffic opportunity and rusty engagement	Oilpro_0005252-254	R
105		2015-07-28 Estevan Dufrin email to David Kent RE: Recruitment scam - fake profile	Oilpro_0005295-96	R
106		2015-07-29 Cdavis email to David Kent RE: Deal Book Page - Oilpro - Houston Ventures	Oilpro_0005300-5338	Н
107		WITHDRAWN	WITHDRAWN	R
108		2014-04-24 David Kent email to Mike Durney RE: Update	Oilpro_0005669	
109		2015-07-31 David Kent email to Estevan Dufrin RE: UK Recruiter	Oilpro_0006045	R
110		2015-11-05 David Kent email to Mike Durney RE: Profuse / Oilpro discussion	Oilpro_0006133-35	

Ps' Ex.	Admitted	Description	Bates No.	Ds' Objection(s) <sup>1</sup>
111		2015-07-28 Oilpro Support email to Mr. Macleod RE: contact support - gmac.abz@gmail.com	Oilpro_0006192	R
112		2015-08-19 Estevan Dufrin email to Phil Williams RE: Oilpro	Oilpro_0006216-18	R
113		2016_01-20 Gchat	Oilpro_0006280	
114		2016-03-07 Matt Kent email to David Kent RE: Rusty Expiring	Oilpro_0006289	R
115		Sales list	Oilpro_0006290 native	R
116		2015-07-18 Kevin J. McKie email to support@oilpro.com RE: Heather Sullivan has connected with you on Oilpro	Oilpro_0006295	R
117		2015-10-21 David Kent email to Bill Day RE: venture capital	Oilpro_0008699-8700	

Ps' Ex.	Admitted	Description	Bates No.	Ds' Objection(s) <sup>1</sup>
118		2014-08-21 Cdavis@houven.com email to David Kent RE: OKgo to bookings plan then call me and I will explain	Oilpro_0009135-36	
119		2014-08-23 Cdavis@houven.com email to David Kent RE: Cost per registrant	Oilpro_0009175-76	R
120		2014-08-23 cdavis@houven.com email to David Kent RE cost per quality registrant is 30	Oilpro_0009180	
121		2014-11-05 Estevan Dufrin email to David Kent RE: images - transmittal of What is Oilpro	Oilpro_0009539-43	
122		What is Oilpro	Oilpro_0009544-48	
123		2014-05-27 David Kent email to Charles Davis RE: Oilpro - faster than RZ by orders of magnitude	Oilpro_0010243-44	

Ps' Ex.	Admitted	Description	Bates No.	Ds' Objection(s) <sup>1</sup>
124		2014-06-23 David Kent email to Chip Davis RE: morning thoughts	Oilpro_0010298	R
125		2014-07-03 David Kent email to Charles Davis RE: Interesting	Oilpro_0010337-39	
126		2014-07-20 David Kent email to cdavis	Oilpro_0010387-88	R
127		2014-11-26 David Kent email to Jake Saper RE: Status	Oilpro_0010985-88	
128		2015-10-28 David Kent email to Jake Saper RE: thanks	Oilpro_0011368	R
129		Profuse Networks Deck	Oilpro_0013073-88	
130		2015-10-28 David Kent email to Jonathan Fairbanks RE: thoughts - transmission email for Layering the Cake	Oilpro_0013196	
131		Layering the Cake 2016	Oilpro_0013197-225	

Ps' Ex. No.	Admitted	Description	Bates No.	Ds' Objection(s) <sup>1</sup>
132		2012-03-12 Email from Bud Montang	Oilpro_0023030-31	R
133		2013-05-08 Edward Krasnov email to David - RE: SIOPCO Projections	Oilpro_0026449	Н
134		2013-05-13 David Kent email to Joe Triepke Re: Files for GECLP	Oilpro_0026476-78	
135		2013-09-10 Mark Sherman email to David@tech.pro RE: Oilpro.com analytics and Paid Search Proposal	Oilpro_0026907	H; R
136		2012-11-02 Email from Bud Montaug	Oilpro_0027062-63	
137		Dice Energy Presentation	OilPro_0027439	
138		2013-05-09 David Kent email to Edward Krasnov RE: SIOPCO Projections	Oilpro_0027552-53	

Ps' Ex. No.	Admitted	Description	Bates No.	Ds' Objection(s) <sup>1</sup>
139		2013-05-16 David Kent email to Melvin Montang RE: Joe Jones-OilCareers - abide by law and ethical standards	Oilpro_0027649-50	R
140		2010-09-15 Matthew Kent email to dkent@rigzone.com FWD: FW: WWW & Rigzone Pricing	Oilpro_0029179-82	R
141		Email from David Kent and Matt Kent re. Employment Agreement	Oilpro_0030041-48	R
142		2016-04-22 Jeremy Antonini email to Matt Kent, et al. RE: Update for Oilpro Team	OilPro_0030077-79	R
143		2016-04-25 Jeremy Antonini email to Joseph Triepke RE: Revised Oilpro Team upate	OilPro_0030080-82	R
144		2016-04-25 Jeremy Antonini email to Bryan (Oilpro) RE: Revised Oilpro Team update	OilPro_0030083-85	R

Ps' Ex.	Admitted	Description	Bates No.	Ds' Objection(s) <sup>1</sup>
145		Antonini Email	Oilpro_0030086	R
146		2016-05-09 David Kent email to Jeremy Antonini RE: Bulk invite upload CSV's - attorney client privilege	OilPro_0030323-24	R
147		2016-04-28 Jeremy Antonini email to Jesse Lisby, et al. RE: Contact support	OilPro_0030330-31	R
148		2016-04-11 Jeremy Antonini email to Jesse Lisby RE: Queries for removing people	OilPro_0030355	R
149		Slip sheet - document provided in native format	OilPro_0030356	R
150		Code	OilPro_0030356	R
151		2015-03-16 David Kent email to Leland Richardson RE: DICE.com	Oilpro_005102	

Ps' Ex.	Admitted	Description	Bates No.	Ds' Objection(s) <sup>1</sup>
152		2014-11-06 David Kent email to Charles Davis RE: Monthly Active Users - Data and Graph - Jeremy freaking genius	Oilpro_10910-15	R
153		2015-09-30 David Kent email to Jonathan Fairbanks RE: Markup attached	Oilpro_13000-13001	
154		2015-07-20 David Kent email to Jeremy Antonini	Oilpro_5129-30	R
155		Email from David Kent to Nick Tran	Oilpro_Solomon 0002126	
156		2015-07-23 Oilpro Site Map	N/A	A; H; NP
157		2015-09-05 Oilpro Site Map	N/A	A; H; NP

### Respectfully submitted,

### JORDAN, LYNCH & CANCIENNE PLLC

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Walter Lynch

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ATTORNEYS FOR PLAINTIFFS DHI GROUP, INC. F/K/A DICE HOLDINGS, INC. AND RIGZONE.COM, INC.

## **CERTIFICATE OF CONFERENCE AND SERVICE**

I hereby certify that on this  $2^{nd}$  day of November, 2020, I served all counsel of record with a copy of this Motion by the Court's electronic filing system.

/s/ Jeb Golinkin
Joseph W. Golinkin II